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ABSTRACT

The report summarizes the findings of a questionnaire sent to the Executive Directors of Higher Education Facilities Commissions for the purpose of evaluating the administration of Title I, of the Higher Education Act of 1963. Subjects covered include the decentralization of the Offices of Education, the effectiveness of the construction service, conflicts and duplication of services provided by state agencies, the cutback in federal funds and its effect on state planning, feedback of summary data from the Office of Education, and federal regulations and procedures. (FS)

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AN EVALUATION OF THE ADMINISTRATION OF TITLE I, of the HIGHER EDUCATION FACILITIES ACT of 1963

EF 004 143

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U.S. DEPARTMENT OF HEALTH, EDUCATION & WELFARE
OFFICE OF EDUCATION
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The following report summarizes a questionnaire sent to the Executive Directors of Higher Education Facilities Commissions for the purpose of evaluating the administration of Title I, of the Higher Education Act of 1963. The questionnaire was sent to fifty one State Commissions, the District of Columbia, Puerto Rico, the Virgin Islands and Guam. Thirty eight questionnaires were received in time to be evaluated and included in this summary report. The questionnaire was prepared at the suggestion of the Committee on Decentralization and the Executive Council of the Association.

The questionnaire consisted of twelve questions covering such subjects as the decentralization of the Office of Education, the effectiveness of the construction service, conflicts and duplication of services provided by state agencies, the cutback in federal funds and its effect on state planning, feed back of summary data from the Office of Education, federal regulations and procedures, and suggestions for program changes that each person responding to the questionnaire would like to see implemented.

The chief findings of the evaluation are that the cutback in federal funds is the most serious and acute problem facing the State Commissions and the institutions that they serve. The Title I program to a greater extent than is generally realized has been integrated into the planning and funding processes at the state level so that the abrupt cutback in fiscal 1968 had a severely disrupting effect on state and institutional construction plans for the year.

Decentralization of the administration of the program is approved and accepted by a sizable majority of the Directors who chose to respond to the questions on decentralization. The advantages of personal contact, ease of communication and Regional Office familiarity with the projects and problems of the region are seen to outweigh the concern that the program might be over administered. There is however a definite minority point of view to the effect that decentralization was not working well in the particular region of concern and that conflicts and problems remained to be worked out.

Strong approval was expressed for the revised instruction and application forms. There is general agreement that the Office of Education has done a commendable job of issuing readily understood instructions and regulations but this should not be understood to mean that there is unanimous agreement or approval for all of the regulations and procedures. Considerable concern was expressed over difficulties encountered once the grant award was made. Project close out procedures are mentioned as being unnecessarily cumbersome and a source of undue delay. The "FREEZE" on approval to go to bid was mentioned as being the most costly and frustrating element in the program, and there was a strong plea from several states for the restoration of the advance concurrence procedure.

1. <u>IN YOUR OPINION HAS THE DECENTRALIZATION OF THE OFFICE OF EDUCATION INCREASED THE ADMINISTRATIVE EFFICIENCY OF THE FACILITIES PROGRAM</u>?

In response to the first question, twenty five Facilities Commission Directors responded favorably, agreeing that decentralization of the Office of Education increased the administrative efficiency of the facilities program; ten responded negatively, and three Directors who returned the questionnaire chose to avoid a direct "yes" or "no" answer. The reasons most frequently cited for a favorable attitude toward decentralization are:

1. That a more meaningful and useful relationship can be established at the regional level than was possible when the program was centralized in Washington.

2. Efficiency has been increased because of the increase in staff. This has provided increased contact and quicker resolution of problems.

3. Better communications are facilitated particularly at the institutional level.

Among those who answered the question affirmatively not all would agree that the efficiency and improvement expected of decentralization had actually been demonstrated. Some affirmative answers were based on future expectations rather than past or present performance as can be seen from the following statements:

> "While it is much too early to state a conclusive opinion, the potential of increased administrative efficiency as a result of decentralization has been clearly indicated in my view in the Region."

> "Among the considerations which make this a difficult question to answer is the fact that certain delays in project approval have resulted from the uncertainty of the funding picture in Washington and cannot therefore be charged to the Regional Office."

Among those who reacted negatively to the first question there were indications in their comments that they by no means had cast a negative vote to express a critical view of the program or disapproval of decentralization. One negative vote was cast.

> "But only because I feel that the Division of College Facilities has been extremely well administered."

A more cautious but necessarily disapproving attitude was expressed in the following statement:

> "This is something that can come only with time. We believe that the administrative machinery for improvement is there, and that when we get to learning how to work with it, administrative efficiency will improve."

In contrast with the above stated position, several Executive Directors indicated by their comments that all was not well with decentralization, and that in fact there were serious problems and conflicts that had not been resolved. The complaints of this group centered on the assertion that the Regional Office was interfering with matters of institutional policy.

> "Policies are more uncertain, administration is more variable and interference with matters of institutional policy is a pattern for the first time in the history of the program."

Finally the point was made that where access to the Office of Education had formerly been readily available due to the close proximity of that office, improvement could hardly be expected. One respondent replied that "The Office of Education was only a few blocks away." Under such circumstances significant improvement is hardly likely to occur.

2. IN YOUR OPINION HAS DECENTRALIZATION DECREASED THE AMOUNT OF TIME REQUIRED FOR PROJECT APPROVAL?

There were nineteen affirmative replies and fifteen negative responses. Four of the respondents chose not to reply with a "yes" or "no" answer to the question. Among those who responded affirmatively the point was frequently made that 1967-68 was an "atypical year" filled with uncertainty; however, if we are considering just the amount of time required for Regional Office processing of applications, then it was stated there had been a sharp decrease in the amount of time required.

> "Decentralization has decreased the amount of time generally as evidenced by action after our first closing date this year. However the 'FREEZE' and an appeal has slowed up the second closing date processing."

> "Project approval under decentralization has been very prompt. Comparison is difficult because of the lateness of 1968 fiscal year appropriations."

Among those who responded negatively and expressed a point of view, the point was made that the time required for project approval was dependent on the actions of the Bureau of the Budget and other Federal agencies rather than any action on the part of the Regional Office. Concern was also expressed over the amount of time required for processing payment vouchers and other post approval actions.

> "Now that the Regional Offices are well established the time requirements are apt to be more affected by the Bureau of the Budget and policy changes than by decentralization."

"The amount of time for project review has increased, and delays have been even more pronounced with respect to processing payment vouchers and other post-approval actions."

2. IN YOUR VIEW IS THE REGIONAL OFFICE BETTER ABLE TO PROVIDE YOUR COMMISSION AND THE INSTITUTIONS IN YOUR STATE WITH BETTER TECHNICAL ASSISTANCE AND MORE ACCURATE AND DEPENDABLE ANSWERS TO YOUR QUESTIONS AND PROBLEMS THAN WAS THE CASE BEFORE DECENTRALIZATION?

In response to this question, nineteen Directors indicated that the Regional Office is better able to provide such services. Eleven Directors indicated that there had been no improvement in providing information and answers to the State Commission and the institutions in their state. Among the eight respondents who did not choose to reply with a "yes" or "no" answer to the questions, the feelings expressed were that not enough time had been allowed to make a comparison and that fast and accurate information had been obtained in the past from Washington.

"About the same, technical assistance service was good before decentralization."

Among those who responded affirmatively the increased staffing at the Regional Office level was cited as an important factor enabling the Regional Office to better process and administer grants. Regionalization, it was stated, has also brought the program closer to problems peculiar to the region resulting in a better understanding of these problems.

"Our contacts with the Regional Office increased during the critical period of program review. The applicant, the Regional Program Officer and the Commission ironed out all difficulties."

"Telephone and in-person contacts are more easily accomplished. Regional workshops and briefing sessions are also helpful."

"While this state Commission has never experienced difficulty or delay in obtaining technical assistance and dependable answers from either Washington or the Regional Office, proximity to the Regional Office has greatly benefited individual institutions."

Among the negative responses to the question, it was frequently asserted that equal services had been provided before decentralization and that there had been excellent communications with the Office of Education in Washington.

"We usually get answers to questions and assistance with problems by calling the appropriate office. It is just as easy to reach Washington by phone as it is to reach Boston."

A minority point of view expressing clear dissatisfaction with the Regional Office is indicated in the following statements:

"There has been no improvement, but a decline."

"In time the Regional Office should be able to do as good a job as before decentralization."

4. <u>IN YOUR VIEW HAS THE CREATION OF AN IN-HOUSE OFFICE OF CONSTRUCTION SERVICES BY THE OFFICE OF EDUCATION RESULTED IN A DEFINITE IMPROVEMENT OVER THE SERVICES FORMERLY PROVIDED BY HUD</u>?

There were twenty six affirmative votes and seven negative votes in response to this question, indicating a high degree of agreement to the effect that the construction service was able to provide better service than had formerly been provided by HUD.

Favorable responses to the question were that there had been a general speed-up in processing and a reduction of cross-department

paperwork; that the location in the same office led to greater communications between the two services and improved communication with the state Commissions; "buck passing" was eliminated; and there was a reduction in arbitrary decisions. The increased flexibility of the Office of Construction Services was generally felt to be a significant improvement.

> "HUD personnel did not take a personal interest in particular problems and tended to go by the book, with little room to discuss their interpretation of Office of Education policy."

> "It can point to specific examples of this improvement. It is a great help to me and the institutions to have problems solved primarily at the Regional Office."

> "There appear to be good working relations among architects, engineers and field personnel and the Office of Education personnel."

In casting a "no" vote in response to the question, several Directors indicated that the new location of the Construction Service Office was a factor. The Office was further away than it had previously been, which made direct personal contact somewhat more difficult. A number of questions were raised about the relationship between Construction Service personnel and program personnel.

> "We suspect that there is some internal difficulty between engineers and program people which is becoming apparent to state Commissions when site visits are necessary."

5. <u>DOES THE REVIEW OF CONSTRUCTION DOCUMENTS AND THE SUPERVISION OF CONSTRUCTION PROJECTS BY THE CONSTRUCTION SERVICE DUPLICATE THE SERVICES PROVIDED BY A BUILDING AUTHORITY OR PUBLIC WORKS DEPARTMENT IN YOUR STATE</u>?

Fifteen Directors indicated by their response that there was some duplication, although in some instances perhaps unavoidable. Twenty Directors indicated that they did not feel there was any duplication of Construction Services in their states. It was frequently stated by those who felt that there was no duplication, that the state did not have a central agency that could provide Construction Services or that the duplication, if it existed, was a factor among public institutions, but not among the private institutions within the state.

Among the respondents who indicated that the Construction Service duplicated the services provided by a state agency there was considerable variation in the views expressed. There were positive indications that the Construction Service in several instances was accepting an increasing amount of the state's procedures; on the other hand several of the respondents were strongly critical of the overlapping functions of the Construction Service and the unnecessary delay.

> "We have building inspectors, an architect and an engineer in this office to review and supervise state building programs. In this case there is overlapping. Review of construction documents simply delays the project."

> "State law provides for a State Building Commission to provide architectural services for construction. All construction is reviewed by this Building Commission. There appears to be a duplication in many areas. We would like to suggest that the states be allowed to provide their own technical and planning reviews."

6. <u>DOES THE USE OF FEDERAL CONTRACT DOCUMENTS AND CONSTRUCTION PROCEDURES CONFLICT WITH STATE CONTRACTUAL PROCEDURES AND CONSTRUCTION STANDARDS IN YOUR STATE</u>?

Ten respondents indicated that there was some conflict in the use of Federal contract documents; twenty four respondents stated that there was no conflict. A number of Directors stated that there had been some conflict but that their problems were being satisfactorily worked out.

> "We have been able to iron out our conflicts between state and Federal construction procedures."
>
> "The two systems have been reconciled in a most workable manner in our state."
>
> "There appeared to be conflicts early in the program, but shortly after the initiation of the Act, a statewide conference involving State University, City University, the State Dormitory Authority and private institutions was called and most of the discrepancies in various forms, contract documents, etc. have been resolved."

7. <u>THE CUTBACK IN FEDERAL FUNDS FOR THE TITLE I PROGRAM HAS MOST SERIOUSLY AFFECTED THE PUBLIC INSTITUTIONS IN YOUR STATE, THE PRIVATE INSTITUTIONS IN YOUR STATE, BOTH EQUALLY</u>?

There were thirty five responses to this question. Sixteen respondents stated that both the public and private institutions were equally affected, twelve indicated that the public institutions were most seriously affected in their states, and seven stated that the private institutions were most adversely affected. Among those who responded that the private institutions were most seriously affected it was stated that because of smaller enrollment increases the private institutions tended to rank lower on priority standards, and that the private institutions have not been able to secure matching funds as needed.

> "The cutback has been disastrous in both areas, but even with a state plan favorable to private institutions, it is very difficult for them to qualify. A few priority public projects take virtually all of the funds."

> "The cutback in Title I funds appears this year to have most adversely affected the private institutions. Of five recommendations that had to be withdrawn one was a community college and four were private section 104 institutions."

A frequent explanation given by the Directors who indicated that the public institutions were most seriously affected, was that there was greater growth in the public sector and that it was the 103 institutions, the community colleges particularly that were hardest hit by the cutbacks. These views were most strongly presented by the largest states with the heaviest population concentrations.

> "Even with the cutbacks in Title I funds all applications from 104 institutions have been funded to the full one-third. This happened only however because of the shortage of matching funds by public institutions. Hardest hit therefore in the cutback were 103 applications."

> "Cutbacks in the allocation of federal funds to public community colleges and technical institutes has seriously affected the 103 sector."

Among the respondents who replied that both the public and the private sector were equally affected these points were emphasized. In many cases plans for future development are being suspended, which in turn will result in overcrowded facilities. The shortage of Federal funds is paralleled by a shortage of non-Federal construction funds so that there is an impact not only on current projects, but the cutbacks are also affecting future planning.

8. HAS THE CUTBACK IN FEDERAL FUNDS FOR THE TITLE I PROGRAM ADVERSELY AFFECTED INSTITUTIONAL OR STATE PLANNING FOR ENROLLMENT EXPANSION IN YOUR STATE?

There is general agreement among the respondents that the cutbacks in Federal funds has adversely affected institutional and state planning for enrollment expansion. Twenty three Directors answered the question affirmatively, seven responded negatively. A key point among those who responded affirmatively is the fact that in many states and among many institutions Federal funding, in so far as it can be estimated in advance, is integrated into the overall construction and funding planning that goes on at the state and institutional levels. An abrupt reduction in Federal funds can therefore have serious detrimental effects upon state and institutional construction programs.

> "The cutback as such was not as adverse as the abruptness of timing. The final allotment for the fiscal year 1968 came so late and so suddenly as to cause serious effects."

> "Some institutions have reported that the reduction in funds on one building has caused shifts in financial planning on other buildings, serious reconsideration of enrollment plans, and concern over planned hiring of faculty needed to teach additional students."

Another view expressed with regard to the cutback in Federal funds was that the detrimental effects of the cutback would be felt in planning for enrollment expansion particularly among the private colleges and the public two-year institutions. Concern was also expressed over the immediate effects of the cutback upon institutions that are currently operating under severe handicaps.

"The cutback adversely affected the planning of service for improving quality. We continue to have increases in enrollment, but did not have the funds for additional facilities and therefore had to use churches, vacant buildings and the like."

"The cutback has had the effect of forcing the delay and perhaps postponement of critically urgent projects in a qualitative sense, and has forced unfortunately greater burdens on the state. In our state institutional planning will continue, as well as the state commitment to insure a place for all students."

Among those who responded negatively to the question, uncertainty as to the future of the program was a cause for serious concern, more so than the immediate effects of the cutback.

"Uncertainty is more of a problem than the actual cuts."

"The cutbacks have not as yet affected planning but may delay the realization of plans."

9. <u>IN YOUR VIEW IS THERE SUFFICIENT FEEDBACK OF SUMMARY DATA (COST ANALYSIS, SPACE STANDARDS, ETC.) FROM THE OFFICE OF EDUCATION TO YOUR STATE COMMISSION</u>?

Seventeen Directors responded affirmatively and nineteen responded negatively. This division indicates that there is some confusion as to what can or should be expected in the way of feedback and summary data from the Office of Education. Among the affirmative replies it was stated that some of the states had more adequate sources of data than the Office of Education, and that the data derived from the Facilities Planning Grant would be most helpful.

"We have better data on the state level than the Office of Education."

The negative views expressed in response to this question were in many instances quite critical of the lack of feedback on data relating to space factors and cost analysis.

"I cannot recall any Federal feedback on cost analysis, space standards etc. from the Office of Education."

"There has not been sufficient feedback on data relating to space factors and cost analysis. Promised computer services from the Office of Education have not been forthcoming to date."

"Improved data handling techniques are sorely needed throughout the programs administered by the U. S. Office of Education."

10. ARE PRESENT REGULATIONS AND PROCEDURES FOR THE TITLE I PROGRAM ISSUED BY THE OFFICE OF EDUCATION CLEARLY AND READILY UNDERSTOOD BY YOU AND THE INSTITUTIONAL REPRESENTATIVES IN YOUR STATE?

The response to this question was twenty seven affirmative replies and seven negative votes. There is a high degree of agreement to the effect that the application forms and instructions have been significantly improved and that the forms are much simpler than they were several years ago. However considerable concern was expressed over the fact that the institutional officers do not necessarily understand the process or the forms any better than they did in the past, and considerable assistance is required particularly for the smaller institutions if an adequate job of filling out the forms and preparing a grant request is to be accomplished.

"We doubt that there is any language which is clearly and readily understood by institutional representatives."

"Generally instructions and applications are clearly understood. Institutions with small administrative staffs who must carry additional assignments require more detailed assistance by the state Commission staff in the preparation and submission of an application."

"Most institutional representatives need a great deal of help because they work with the program once or at most twice a year and do not carefully study the regulations."

11. IN YOUR OPINION HAS THE AMOUNT OF FEDERAL CONTROL AND DIRECTION OVER THE TITLE I FACILITIES PROGRAM BEEN INCREASING, DECREASING, REMAINED ABOUT WHAT IT WAS SINCE THE INCEPTION OF THE PROGRAM?

A majority of those who responded thought that Federal control and direction of the program had remained about what it was since the inception of the program. Twenty-one Commission Directors so indicated. Thirteen Directors thought Federal control was increasing and two thought control was decreasing.

> "Federal control as we understand the term is not a problem."

> "With the exception of a few minor instances in areas relating to excessive cost, there has been little change in the amount of Federal control."

With regard to Federal controls the point was also made that this is a two-sided question and that where the Commissions conscientiously and effectively carry out the responsibilities entrusted to them there is less likelihood of increasing Federal control.

> "Where state Commissions accept their responsibility and fully carry out the program as intended by Congress, I see little evidence of increasing Federal control over the program other than that necessary to administer the program effectively. Poor administration of the program by a state Commission invites increased Federal control."

Among those who thought that Federal control was increasing the complaint was frequently voiced that the regional staff was getting too involved or lost in the minutia, and that there were too many questions and requests of the "nit-picking" variety. Some fear was also expressed over the impact on the program, of Federal requirements, such as wage rates, etc. originating outside of the program or the Office of Education.

"The Office of Education tends to look for the 'I' to be dotted and the 'T' to be crossed."

"Federal review digs too deeply into matters that I believe are none of their business."

"Pressure under the Civil Rights section is increasing in other areas of the nation and we have been warned to expect stricter interpretation."

"Satellite programs, such as the Poverty Program, Urban Development, Labor Standards, etc., if carried much further may well prejudice the effectiveness of the program to the point of complete subordination."

12. IF YOU COULD CHANGE THE REGULATIONS OR PROCEDURES FOR THE ADMINISTRATION OF THE TITLE I PROGRAM, WHAT CHANGES WOULD YOU CHOOSE TO MAKE?

The answers to this question have generally fallen into the three categories of funding, suggested improvements in administration and suggested changes in the regulations. The greatest number of suggestions were in the funding area indicating acute concern over the shortage of construction funds and with related funding problems.

12-A FUNDING

The lack of flexibility as to the percentage of the total cost of a project that can be funded from a grant is being questioned in a number of states. It was suggested several times that increased funding flexibility was desirable, and that the matching ratio should be increased to a Federal minimum of fifty percent.

There is a need for access to "short term" or interim financing when an institution can give reasonable assurance of obtaining the required funds within a five-year period, but may not have the matching funds on hand at the time the project application is submitted to the state Commission.

It was suggested by a number of state Commissions that there would be some definite advantages to coordinating Titles I, II, and III; that Title II and III requests should be routed through the state Commissions for comment and recommendations; and that the administration of Title II and III grants or loans should be delegated to the Regional Office.

A problem of particular concern to states that are sparsely populated is the exceedingly small allotment which in some instances is hardly sufficient to fund a project of reasonable size. It is suggested that the basic allotment for sparsely populated states be increased in an amount sufficient to fund at least one project of reasonable size.

A considerable number of problems are caused by the delay of Congressional action in making the appropriations. It was suggested that to overcome this difficulty, Federal funds should be allocated one year in advance. Such a step it was felt would greatly assist the state Commission in the orderly planning of the state building program. Advanced allocations would also be of great assistance to the institutions and to the financial planning carried on at the state level.

At the present time there is some confusion over the funds available for one or two years, and the regulations dealing with the procedure for accepting or rejecting partial Federal shares. It is suggested that some revision and expansion of the regulations would be appropriate to clarify the procedures for dealing with these problems.

12-B GRANT ADMINISTRATION

In the area of grant administration there is a growing disenchantment with current Office of Education procedures. A number of Directors in one way or another have expressed the view that after the projects are approved and the grant awards made, the administration of the program should be left to the state Commission, or the Regional Offices which are more sensitive to and aware of the time schedules that have to be met to provide for expanded enrollments, new programs, and the opening of new institutions. Criticism is focused particularly at the final inspection, clarification of budget items, and the securing of final payment.

> "Greater authority in final grant approval should be granted to the Regional Office. Greater flexibility in major policy matters should be given to the Regional Office so that they might exercise judgment in the treatment of problem areas relevant to the region which they are serving."

> "By far the most costly and frustrating administrative action is the current 'FREEZE' on approval to bid."

> "Engineering personnel should be answerable to program personnel. Two independent programs are not satisfactory."

> "Make contract documents and construction procedures more flexible to permit coordination with the less stringent requirements of the State Department of Public Works. The state architect insists that bids are as much as 10% higher when contractors must meet Federal regulations. This is an exhorbitant amount in view of the general adequacy of our state procedures."

12-C SUGGESTED CHANGES OF THE REGULATIONS

The restoration of advance concurrence on a project application that has been filed with the state Commission was most frequently mentioned as the regulation change most desired.

> "We would like to see some provision for authorizing construction after a Title I application is filed in cases where waiting for grant approval works a hardship on the institution. In all other respects the administration seems reasonable and workable."

> "Permit prior concurrence to proceed with construction as was done in the past. Elimination of prior concurrence is a serious problem particularly in the public institutions."

Other suggested changes were that the eligibility requirements should be broadened to more efficiently meet the needs of all institutions for the improvement of existing facilities, as well as the construction of new facilities, and that, as already mentioned, clarification is required regarding the procedure for accepting or rejecting partial Federal shares.

Finally it was suggested that provision should be made for adequate lead time when there are changes in the regulations or the operation of the program.